
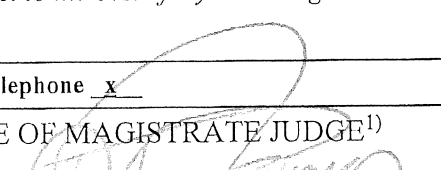


CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Angela Marie Lucas ; DOB: 1986; United States	DOCKET NO. 23-08613MJ MAGISTRATE'S CASE NO.
Complaint for violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).	
<p>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</p> <p>On or about March 4, 2023, in the District of Arizona, Angela Marie Lucas, knowing or in reckless disregard that certain aliens, including Maria De Jesu Martinez-Anorve, Aldo Anibal Duarte-Figueroa, Manuela Marcos-Vargas, and Catarina Diaz-Cardona, had come to, entered, and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).</p>	
<p>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</p> <p>On or about March 4, 2023, in the District of Arizona (Sasabe), United States Border Patrol Agents (BPAs) were driving south on State Route (SR) 286 when they came upon a 2004 Mitsubishi Endeavor parked on the west side of the road with its rear passenger door open. BPAs observed an adult woman carrying a small child moving to get into the vehicle and a man attempting to climb over a barbed wire fence. Both adults were dressed completely in camouflage clothing. The BPAs conducted a vehicle stop and found Angela Marie Lucas sitting in the passenger seat with three people dressed in camouflage lying down on the collapsed rear seat and cargo area. The six people dressed in camouflage, including Maria De Jesu Martinez-Anorve, Aldo Anibal Duarte-Figueroa, Manuela Marcos-Vargas, and Catarina Diaz-Cardona, were determined to be Mexican and Guatemalan citizens illegally present in the United States. In a subsequent search of the vehicle, BPAs also discovered a small bag in the glovebox in front Angela Marie Lucas that contained 9.1 grams of marijuana, 7.8 grams of methamphetamine, and 0.4 grams of cocaine.</p> <p>Records checks revealed that Maria De Jesu Martinez-Anorve, Aldo Anibal Duarte-Figueroa, Manuela Marcos-Vargas, and Catarina Diaz-Cardona did not have the proper immigration documentation to enter or remain in the United States. Material witnesses Maria De Jesu Martinez-Anorve, Aldo Anibal Duarte-Figueroa, Manuela Marcos-Vargas, and Catarina Diaz-Cardona said they or their friend or family had arranged for them to be smuggled into the United States for money.</p>	
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MATERIAL WITNESSES IN RELATION TO THE CHARGE: Maria De Jesu Martinez-Anorve, Aldo Anibal Duarte-Figueroa, Manuela Marcos-Vargas, and Catarina Diaz-Cardona	
Detention Requested <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Border Patrol Agent
Sworn by telephone <input checked="" type="checkbox"/>	
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 	DATE March 6, 2023

¹⁾ See Federal rules of Criminal Procedure Rules 3, 4.1, and 54

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Material witness Manuela Marcos-Vargas stated that she illegally crossed the International Boundary Fence (IBF) and was instructed to walk north until she encountered BPAs and then to turn herself in. Marcos stated that while walking she encountered a group of six and walked with them an hour until arriving at a road. A vehicle stopped at their location and she got in with another person. Marcos stated that when she was inside the vehicle a Border Patrol vehicle stopped behind them and apprehended all the people in her group along with the people that arrived in the vehicle.

Material witness Catarina Diaz-Cardona stated that she illegally crossed the IBF with four other people and a child. Diaz said they were to walk to a load vehicle that would assist them in furthering their smuggling attempt. After walking for an hour, the group waved down a gray vehicle that was driving by. Diaz claimed that no one in her group approached the vehicle and she was unaware why they began boarding, but she just followed along and proceeded to enter through the rear. Diaz said the group had not finished loading when a Border Patrol vehicle approached and placed everyone under arrest.

Material witness Aldo Anibal Duarte-Figueroa stated that he illegally crossed the IBF as part of a group of six and walked to an area near a paved road following a foot guide who led them to a road and then returned south. Duarte said a vehicle was parked on the side of the road and a person sitting in the passenger side seat waved at the group in a motion that indicated for them to approach the vehicle. Two females in the group entered the vehicle and Duarte said he tried to cross a barbed wire fence when his backpack became trapped on the barbwire. While struggling to release the backpack a Border Patrol vehicle arrived, and BPAs apprehended everyone.

Material witness Maria Martinez-Anorve stated that she illegally crossed the IBF as part of a group of four other undocumented noncitizens and one child. Martinez said she was aware that a load vehicle had been arranged to pick them up but she was unaware of the load out site. After crossing, the group walked for several hours and rested. Martinez said the younger Mexican male led the group most of the way until reaching a point adjacent to a highway where they hand signaled to a vehicle driving by. The vehicle pulled over and the older woman in her group communicated to the passenger of the vehicle that she was injured. Martinez said she was unaware if this was the prearranged load vehicle but proceeded to follow everyone else and get inside. The vehicle never had a chance to pull away and drive off because BPAs arrived and arrested everyone.

In a post-*Miranda* statement, **Lucas** stated that she met an individual about six months ago and again the night before this event. The individual proposed a way for her to make money by picking up people near the border and bringing them to Phoenix, Arizona. The individual provided directions where to go to pick up the people and said they would be waiting off Antelope Road. **Lucas** said she knew the people she would be picking up were undocumented noncitizens. **Lucas** had her dad with her; he was the driver of the vehicle. **Lucas** said she followed the directions and picked up the people and while driving north on SR 286 the vehicle experienced mechanical issues. **Lucas** said they stopped and told the people to exit her vehicle. **Lucas** claimed the people exited and were in the process of getting back inside when BPAs pulled behind them.

On September 14, 2022, **Lucas** was convicted of a misdemeanor related to alien smuggling in 22-MJ-4841-EJM.